

December 20, 2021

Via ECF

Honorable Allyne R. Ross, U.S.D.J.
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *DeVito v. Neiman, et al.* EDNY Case No. 19-CV-5099 (ARR)(RML)

Dear Judge Ross:

My office represents the plaintiff, Robert DeVito, in the above-referenced case.

I am writing to request a 30-day extension of the December 22nd deadline to file a stipulation of dismissal. I am making this request because four of the defendants—Herman Jacobowitz, Expedite Collections Inc., Barry Klein, and RFC Distributors Inc.—have agreed to have the underlying NYC Civil Court case pending against Plaintiff discontinued with prejudice, but they have not yet accomplished this. In the interests of judicial economy, Plaintiff would like to wrap everything up prior to dismissal.

All of the defendants, with the exception of Jeffrey Neiman, Esq., Klein, and RFC have consented to this motion. I have not yet heard back from Neiman or from counsel for Klein and RFC.

Respectfully,

/s/ Brian L. Bromberg
Brian L. Bromberg

cc: All Counsel of Record (Via ECF)